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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TERESA MARETTA and RICHARD MARETTA,)

Plaintiffs,)

v.)

No.: 08 CV 4643

LIBERTY MUTUAL FIRE INSURANCE)
COMPANY,)

Defendant.)

**UNOPPOSED DEFENDANT'S MOTION
TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, LIBERTY MUTUAL FIRE INSURANCE COMPANY, ("Liberty"), by and through its attorneys, Bradley C. Nahrstadt and Christina D. Harrison of Williams, Montgomery & John Ltd., respectfully moves this Court to extend its' time to answer or otherwise plead by thirty (30) days to September 22, 2008, pursuant to Federal Rule of Civil Procedure 6(b)(1). In support of its motion, Defendant states:

1. Plaintiff filed this matter in the Circuit Court of Cook County on July 9, 2008.
2. Plaintiff obtained service on Liberty's agent for service of process, Michael T. McRaith, the Illinois Director of Insurance, on July 18, 2008.
3. On August 15, 2008, Liberty filed a Notice of Removal removing this matter from the Circuit Court of Cook County to the United States District Court for the Northern District of Illinois.
4. Williams Montgomery & John Ltd. filed its appearance on behalf of Liberty before this Court on August 15, 2007.

5. Pursuant to Federal Rule of Civil Procedure 81(c), Liberty is permitted until August 22 to answer or otherwise respond to the Complaint.

6. Liberty respectfully requests that this Court extend their time to answer or otherwise plead by thirty (30) days to September 22, 2008, pursuant to Federal Rule of Civil Procedure 6(b)(1).

7. There is good cause to permit this extension. Defendant's counsel needs to time to investigate the allegations beyond the issue of removal before filing a responsive pleading.

8. Counsel for Liberty, Christina D. Harrison, spoke with counsel for plaintiffs, Steven Fuoco, and plaintiffs do not oppose to this motion.

WHEREFORE, Defendant LIBERTY MUTUAL FIRE INSURANCE COMPANY respectfully requests that this Court grant its Motion to Extend Time to Answer or Otherwise Plead to September 22, 2008 pursuant to Federal Rule of Civil Procedure 6(b)(1).

Respectfully submitted,

LIBERTY MUTUAL FIRE INSURANCE COMPANY

By: /s/ Christina D. Harrison
One of Its Attorneys

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